

### IS THERE A NEED FOR LPMF?

Yes. As current music director of a commercial station, and a veteran of almost 30 years in broadcasting, I am constantly bombarded by the same 200 “most popular songs” that every radio station in the world seems to play over and over again. This seems to be the rule whatever the format. It is feared that a small percentage of the audience may not remember a particular song, and might switch to another station to hear more of the same old same old. This, of course, might affect the ratings, which could cut into the money the station is able to generate. It’s a classic example of programming driven almost entirely by profit, and not the minority listeners’ wants and needs.

There is and will always be, a smaller percentage of the audience (perhaps 10 or 15%) hungering for a much wider variety in programming that will never be fulfilled as long as a large, corporate radio station is programmed for profit.

It’s also true that currently licensed radio stations, commercial or public cover such a wide area, that it is not in their interest to target the concerns of the smaller towns. Even when the station is licensed to a small community, it targets the largest center of population it’s able to reach. The small “city of license” is left with virtually no local involvement.

### SHOULD LPFMs BE COMMERCIAL?

No. No matter how small, if there is an opportunity for financial gain, this will become the focus of almost all applicants. The applicants whose primary goal will be to serve the community of license are the ones who need to be given the best chance to do so. If LPFMs are offered as commercial opportunities, the FCC will have their dreaded “land rush”.

### SHOULD LPFMs BE ALLOWED AS MUCH AS 1,000 WATTS?

No. Again, if a small community operator is given the facilities to effectively cover the larger town next door, the larger town will become the target market.

BUT MORE IMPORTANTLY.....1,000 watts does not fit the definition of “low power fm”. As much as I would enjoy owning and operating a 1,000 watt outlet, I realize this is far beyond the scope or “community radio”. The whole point is the need for many more small voices. And for every 1,000 watt station allowed to operate, there could be as many as six 100 watt stations denied a community voice, to make room for the big guy.

### SHOULD THE 100 WATT AND LESS LPFMs BE SECONDARY SERVICE?

No. Simply eliminate the 1,000 watt proposal entirely. To be totally dedicated to local community service, the LPFM applicant should be reasonably assured that the “big guy” will not force him out of the neighborhood.

### SHOULD LPFMS BE REQUIRED TO PROVIDE 2<sup>ND</sup> AND 3<sup>RD</sup> ADJACENCY PROTECTION?

No. Their much lower power makes it unnecessary. Up to 6 times as many stations could fit on the spectrum if the less restrictive standard is used. In massive experimentation with low power levels on FM I have had very little such type interference from the full power licensed stations, and have produced none for them.

STATION LICENSE HOLDERS SHOULD HAVE TO LIVE IN THE COMMUNITY THE STATION WOULD SERVE, AND NO ONE SHOULD BE ABLE TO OWN MORE THAN ONE STATION.

Yes. Both good ideas, and both would help curb the “land rush”.

SHOULD THE SALE OR TRANSFER OF STATION LICENCES BE PROHIBITED?

No. If the current operator finds he can no longer operate the station in the community's public interest For whatever reason, should the community have to pay by having their station leave the air? No! Give another qualified operator a chance to save the service.

SHOULD AT LEAST 75% OF PROGRAMMING BE LOCALLY ORIGINATED?

Yes! We have enough satellite programmed "clones" already on the air. Community radio should be community programmed.

WHAT ABOUT MULTIPLE APPLICANTS FOR THE SAME FREQUENCY/COMMUNITY?

Whatever it takes.....auction, lottery OK. Competition is a fact of life. However, if lpfms are given non-commercial status as I recommend, the auction bids would likely be much more reasonable since the Money-hungry commercial applicants would be less likely to apply.

EXCLUDE 'PIRATE' BROADCASTERS?

Some. If they've been told to leave the air and have voluntarily done so, I believe that shows enough respect for the FCC to warrant a consideration for licensing. If, however, after the initial warning it became necessary to fine the individual or seize their gear, then this is someone we don't need as a "community servant".

IN CLOSING:

I sincerely hope the FCC takes a positive stance on Low Power FM, and establishes this service in the interest of better serving the public need. There IS a need, it will work without hurting existing broadcasters provided the power levels are kept within true "community radio" definitions. (No kilowatts!)

Cordially,

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